

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	Case No. 1:18-CR-454
	)	
v.	)	The Hon. Claude M. Hilton
	)	
ISAAC N. GIBBONS,	)	Trial: November 12, 2019
	)	
Defendant.	)	

**GOVERNMENT'S NOTICE OF  
INTENT TO USE EXPERT TESTIMONY AT TRIAL**

The United States of America, by and through undersigned counsel, hereby files notice pursuant to Rule 16(a)(1) of the Federal Rules of Criminal Procedure, Rules 702, 703, and 705 of the Federal Rules of Evidence, and the order governing discovery in this matter, *see* Dkt. No. 46, that it intends to call the following experts in its case-in-chief at trial:

1. FBI Forensic Examiner Brandon McCollum. It is expected that Forensic Examiner McCollum, a forensic examiner with the FBI's DNA Casework Unit at the FBI Laboratory in Quantico, Virginia, will testify as an expert regarding serological testing and nuclear deoxyribonucleic acid (DNA) typing. In particular, it is expected that Mr. McCollum will testify about his examination of male DNA obtained from vaginal swabs of the victim, Jane Doe, and the comparison of that male DNA to known DNA samples from both the defendant, Mr. Gibbons, and Kenneth See. Mr. McCollum prepared several laboratory reports describing the examinations he conducted on DNA evidence in this case, copies of which are attached hereto as Exhibits 1-4. The United States anticipates that Mr. McCollum will testify consistent with the information and opinions contained within those reports. Mr. McCollum's *curriculum vitae*, which outlines his

education, training, experience, and skill, is attached hereto as Exhibit 5 and is incorporated by reference into this notice.

2. Matthew F. Soulier, M.D.. It is expected that Dr. Soulier, a forensic psychiatrist, will testify as an expert on the effects of trauma, alcohol and other drugs on memory, as well as counterintuitive behaviors of sexual assault victims. Concerning memory, Dr. Soulier will testify about the difference between fragmentary memory loss versus blackout memory loss, the restoration of memory, and how memory responds to traumatic events and alcohol and other drug use. Concerning victim responses, Dr. Soulier will testify about the thought process and reasoning informing a victim's seemingly counterintuitive behaviors following a sexual assault, including: how a victim's perceptions of autonomy, safety and vulnerability affect decision making; how a perpetrator's actions affect a victim's responses leading to, during and following a sexual assault; and how a victim builds psychological defenses to cope with a difficult situation, particularly over the course of a prolonged offense. Dr. Soulier's *curriculum vitae*, which outlines his education, training, experience and skill, is attached hereto as Exhibit 6 and is incorporated by reference into this notice.

Respectfully Submitted,

G. Zachary Terwilliger  
United States Attorney

By: /s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2019October 28, 2019October 28, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/

Danya E. Atiyeh  
Assistant United States Attorney